

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**RACHEL RAMSBOTTOM  
ALEXIS BOWLING  
JENNA HOUSTON  
JANE DOE #1**

**Plaintiffs**

**v.**

**LORIN ASHTON,  
AMORPHOUS MUSIC, INC.,  
BASSNECTAR TOURING, INC.,  
C3 PRESENTS, L.L.C.,  
INTERACTIVE GIVING FUND,  
GNARLOS INDUSTRIES, LLC,  
CARLOS DONOHUE; ABC  
CORPORATIONS, ONE THROUGH  
TEN (said Names Being Fictitious),  
JOHN DOES, ONE THROUGH TEN  
(said Names Being Fictitious)**

**Defendants.**

**CIVIL ACTION**

**No. 3:21-cv-00272**

**JURY TRIAL DEMANDED**

**JUDGE ALETA A. TRAUGER**

**REVISED JOINT MOTION TO EXTEND THE DEADLINE FOR DEFENDANTS  
GNARLOS INDUSTRIES, LLC AND CARLOS DONOHUE TO FILE ANY MOTIONS  
TO DISMISS AND TO EXTEND RESPONSE AND REPLY DEADLINES**

Comes now Plaintiffs and Defendants Gnarlos Industries, LLC (“GI”) and Carlos Donohue (“Donohue”), by and through undersigned counsel, and pursuant to Local Rule 6.01, and respectfully move this Court for an Order extending the deadline for Defendants GI and Donohue to file any Motions to Dismiss. This Motion is intended to revise and replace Document Number 93. In support of this Motion, undersigned counsel states:

All counsel to this action that had been served, during a meet and confer conference call held on May 17, 2021, agreed that, to the extent any defendant should file a Motion to Dismiss,

that Plaintiffs would be permitted thirty (30) days to respond; and that any defendant would be permitted fourteen (14) days to file a reply to any opposition from the service of said opposition. Counsel for Defendants GI and Donohue waived service of process and accepted service of the First Amended Complaint on June 24, 2021.

The deadline for Defendants GI and Donohue to file any Motions to Dismiss is August 23, 2021. The Plaintiffs and Defendants GI and Donohue are attempting to resolve an issue related to the Motions to Dismiss, which could lessen legal issues for this Court to resolve.

Undersigned counsel has conferred with counsel for each of the non-moving Defendants, who state that they have no objection to the relief requested in this Motion.

Counsel for Defendants GI and Donohue and counsel for Plaintiffs respectfully move for an Order allowing:

1. Defendants GI and Donohue to file any Motions to Dismiss on or before August 30, 2021;
2. Plaintiffs' response to Defendants GI and Donohue's Motions to Dismiss to be filed no later than September 29, 2021; and
3. Defendants GI and Donohue may file a reply no later than fourteen (14) days from service of Plaintiffs' opposition.

Dated: August 20, 2021

RESPECTFULLY SUBMITTED:

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## CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was filed with the Court's electronic filing system and thereby sent via email to the following:

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on this the 23rd day of August, 2021.

/s/ Brian Kent